

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

CLARA HERNANDEZ,
Plaintiff,

v.

**STATE FARM LLOYDS AND JOEY
BROU,**
Defendants.

§
§
§
§
§
§
§
§

CIVIL ACTION NO. 2:15-CV-00165-J

JURY DEMANDED

JOINT STIPULATION OF DISMISSAL WITHOUT PREJUDICE

Plaintiff Clara Hernandez (hereinafter “Plaintiff”) no longer wishes to pursue the above numbered lawsuit. Plaintiff respectfully moves that this matter be dismissed, without prejudice, as to any and all claims which Plaintiff brought, or could have brought, in this case against Defendants. Defendants State Farm Lloyds and Joey Brou are not opposed to the relief requested by Plaintiff.

WHEREFORE, PREMISES CONSIDERED, the Parties respectfully request that the Court grant this Joint Stipulation of Dismissal without Prejudice and enter an Order of Dismissal without Prejudice. The parties request all such other and further relief to which they may be justly entitled.

Respectfully submitted,

MOSTYN LAW

/s/ René M. Sigman

René M. Sigman

Attorney-in-Charge

Texas Bar No. 24037492

rmsdocketefile@mostynlaw.com

MOSTYN LAW FIRM

Sean C. Timmons

Texas Bar No. 24067908

J. Ryan Fowler

Texas Bar No. 24058357

3810 W. Alabama Street

Houston, Texas 77027

(713) 714-0000 (Office)

(713) 714-1111 (Facsimile)

Channy F. Wood

L.R. 83.10 Local Counsel for Plaintiffs

Texas Bar No. 00791954

Wood Law Firm, LLP

1222 South Fillmore

PO Box 1439

Amarillo, Texas 79105

(806) 372-9663 (Office)

(806) 372-9664 (Facsimile)

cwood@woodlawfirm-tx.com

ATTORNEYS FOR PLAINTIFF

/s/ W. Neil Rambin

W. NEIL RAMBIN

State Bar No. 16492800

rambindocket@sedgwicklaw.com

L. KIMBERLY STEELE

State Bar No. 04127600

kimberly.steele@sedgwicklaw.com

SCOTT P. BRINKERHOFF

State Bar No. 24069419

scott.brinkerhoff@sedgwicklaw.com

SEDGWICK LLP

1717 Main Street, Suite 5400

Dallas, Texas 75201

(469) 227-8200

(469) 227-8004 (Fax)

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on all counsel of record by electronic filing pursuant to the Federal Rules of Civil Procedure on this the 16th day of October, 2015.

W. Neil Rambin

L. Kimberly Steele

Scott P. Brinkerhoff

SEDGWICK LLP

1717 Main Street, Suite 5400

Dallas, Texas 75201

(469) 227-8200 (Office)

(469) 227-8004 (Facsimile)

/s/ René M. Sigman

René M. Sigman